

DORSEY & WHITNEY LLP  
Laura M. Lestrade  
51 West 52<sup>nd</sup> St.  
New York, NY 10019-6119  
Telephone: (212) 415-9227  
Facsimile: (212) 953-7201  
Email: lestrade.laura@dorsey.com  
*Attorney for Defendant Mike Dai*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, individually	)	
and on behalf of all others similarly	)	Civil Action No.: 18-2293
situated,	)	(FLW)(ZNQ)
	)	
Plaintiff,	)	Hon. Zahid N. Quraishi
	)	
v.	)	<b>CERTIFICATION OF LAURA</b>
	)	<b>LESTRADE</b>
RIOT BLOCKCHAIN, INC. f/k/a	)	
BIOPTIX, INC., JOHN O'ROURKE,	)	
JEFFREY MCGONEGAL, BARRY	)	
HONIG, CATHERINE	)	
DEFRANCESCO, MICHAEL	)	
BEEGHLEY, JOHN STETSON,	)	
MARK GROUSSMAN, ANDREW	)	
KAPLAN, MIKE DAI, JASON LES	)	
and ERIC SO,	)	
	)	
Defendants.	)	

I, Laura Lestrade, of full age, hereby declare and certify that:

I am an attorney associated with the firm of Dorsey & Whitney LLP, and I a member in good standing of the bar of the State of New Jersey, admitted to

practice before the United States District Court for the District of New Jersey, and an attorney for defendant Mike Dai (“Defendant”).

I hereby move this Honorable Court in accordance with Local Civil Rule 101.1(c) for an Order admitting Thomas O. Gorman, a partner with the law firm of Dorsey & Whitney LLP, to practice before this Honorable Court *pro hac vice* on behalf of Defendant in the above-captioned matter, and in support of this motion state the following:

1. I have an office for the practice of law at the firm of Dorsey & Whitney LLP, 51 West 52<sup>nd</sup> St., New York, NY 10019-6119.
2. I received a Juris Doctor degree from New York Law School, I am a member in good standing of the bar of the State of New Jersey and I was admitted to practice before the state courts in December, 1992.
3. I was admitted to practice in the United States District Court for the District of New Jersey in or around 1992.
4. I am a member in good standing of the bar of the State of New York, admitted to practice in 1993.
5. Since the dates of the admissions to the bars and courts set forth above, I have continued to practice in these courts and have at all times remained a member in good standing of the bars and these courts.

6. I have never been held in contempt of court nor censured in a disciplinary proceeding, suspended or disbarred by any court or admonished by any disciplinary committee of the organized bar, nor the subject of any pending complaint before any court.

7. I have read and will comply with Local Civil Rule 101.1(c) of this Court. I will also comply with the provisions of the Federal Rules of Civil and Criminal Procedure, the Federal Rules of Evidence, and the Local Rules of Practice for the United States District Court for the District of New Jersey.

8. I submit this motion for the admission *pro hac vice* of my colleague, Thomas O. Gorman, who is a partner at Dorsey & Whitney LLP.

9. Thomas O. Gorman is an attorney who is duly licensed and qualified to practice law in the State of New York (Bar No. 2367407), and in the state of Ohio (Bar No. 30081), and the District of Columbia Bar (Bar No. 398734). Mr. Gorman has also been admitted to practice before the Sixth Circuit and the United States District Courts for the Southern District of New York, the Northern District of Ohio, the Southern District of Ohio, the District of Columbia, and the District of Colorado.

10. Mr. Gorman is an attorney with Dorsey & Whitney LLP, practicing at the firm's Washington, DC office located at 1401 New York Avenue NW, Suite

900, Washington, DC 20006. Mr. Gorman is fully familiar with both this case and the areas of law pertaining to this case.

11. The certification of Mr. Gorman is being submitted in support of this Motion.

12. I am confident that Mr. Gorman is fully conversant with the Local Civil Rules of the United States District Court for the District of New Jersey, and has advised me that he will abide by those Rules. I have agreed to work with Mr. Gorman in this action.

13. I agree to be held responsible for the filing of all pleadings, briefs and other papers filed with the Court and to have such papers signed by me, or another attorney with Dorsey & Whitney, LLP authorized to practice law in the state of New Jersey. I further agree to be held responsible for the conduct of my specially admitted colleague should this application be granted.

14. I further agree to continue to make all court appearances unless otherwise excused by the Court.

15. I understand that payments are to be made to the New Jersey Lawyer's Fund for Client Protection on behalf of Mr. Gorman, pursuant to New Jersey Court Rule 1 :28-2(a), for each calendar year of his *pro hac vice* admission in this action (to the extent that such fee has not otherwise been paid in connection with another matter).

16. I understand that payments are also to be made to the Clerk of the United States District Court for the District of New Jersey, pursuant to Local Rule 101.1(c)(3), on behalf of Mr. Gorman, for his *pro hac vice* admission in this matter.

17. A proposed form of Order is submitted herewith.

WHEREFORE, Defendant, by and through his undersigned counsel, respectfully requests that Mr. Gorman be admitted *pro hac vice* as an attorney in the United States District Court for the District of New Jersey, to advise, represent and appear on behalf of Defendant in this action and to participate in the trial or argument of all matters before the Court concerning this action.

DATED: August 23, 2019

By: /s/ Laura M. Lestrade  
Laura M. Lestrade